PROPOSAL

Procedures for Assessment and Reclamation and Disposal of Damaged Building Materials from the General Industries Fire Damaged Property

prepared by

Professional Industrial Hygiene
Robert F. Walter
2415 Lee Road Unit #2
Cleveland, OH 44118
216-233-1094

SUMMARY of PROPOSED PROCEDURES

The property is **owned by** B-Vest Properties (herein described as the "property") has sustained catastrophic fire damage on July 3, 2008. The result is that areas of the property are now contaminated with asbestos-containing building materials much of which is possibly friable.

It is the **intent of the owner**, B-Vest Properties, to meet its regulatory responsibility by addressing the hazardous materials - asbestos and chemical filled containers - in a timely yet necessarily cost effective manner. The potential for environmental or personal exposure will be minimized or eliminated while operations are underway.

A critical element in the financial equation necessary to defray the cost of completing this project is the **reclamation** of select building materials. These procedures are intended to verify that all materials scheduled for reclamation will be asbestos-free.

Any **bulk chemicals** on-site will be characterized by the appropriate chemical analysis to verify the proper hazard classification. This characterization is the first step in any plan for the responsible removal of these materials. Steps are currently being taken to have the previous property owner to uphold the property transfer-agreement to remove said materials.

PROPOSED PROCEDURES

A. Site Conditions

The effects of the fire have been to completely end any productive work activities at this manufacturing site. The site has been inactive since the fire and in compliance with the City of Elyria - "STOP WORK ORDER" issued on July 8, 2008.

The property is bordered by Olive Street to the West, the railroad line to the North, the Aztek Steel Company to the East, and Taylor Street to the South. A property fence - chain link - has been installed along both Olive and Taylor streets. The property line with the railroad and with Aztek Steel remain unchanged since prior to the fire.

Approximately 35% of the structures remain standing. None of the buildings were untouched by the fire. The majority of the property is covered by damaged construction materials consisting of brick, steel, and an incomplete list of melted/fire damaged materials including windows, window sashes, roofing, plastics, and conduits.

B. Responsibility for Site

B-Vest Properties Incorporated is the registered owner of the site. It is the responsibility of

B-Vest Properties to properly dispose of the hazardous materials present on the site.

An arrangement was made with the previous owner to remove the bulk chemicals from the site. At this time, attempts are being made to locate and hold responsible, the previous owner of these materials.

C. Hazards On-Site

In addition to the expected site safety hazards, there are two types of hazards specifically addressed by this proposal; Asbestos and Hazardous Chemicals are the hazards of concern.

C1. Asbestos

Asbestos was used as a matter of course in thermal insulation and in roofing materials. This has been verified in this factory by bulk sampling and analysis. Asbestos is present both inside the remaining structure and clearly defined as thermal insulation and present inside the structure as charred roofing and present as ill-defined materials intermingled among the scattered building materials which were destroyed by the fire.

The asbestos materials located inside the building are friable although generally protected by the original heavy covering. This insulation covers pipes in the building and can easily be removed with employment of routine abatement procedures. The remaining pipe insulation is located in the below-grade area used as the mechanical room for power transfer and mechanical systems. Some localized areas of exposed asbestos insulation exist. These may have been damaged during the fighting of the fire or due to another reason. The damaged and exposed asbestos is also in defined areas and easily cleaned by routine abatement procedures. These are primarily along the north wall of the remaining building.

The asbestos roofing materials remaining as part of the existing structure have not been addressed so any comment would be speculation. Some of this roofing has been damaged by the fire and would therefore, be considered friable. Owing to the location of this asbestos at the top of the damaged building, the safety concern requires this be addressed as a distinct topic.

The roofing materials that are asbestos and part of the damaged buildings are located throughout the property. These were part of the buildings along Olive and Taylor Streets and connecting buildings between these and the main structure. These roofing materials are damaged and must be considered friable at least until uncovered and visually examined on site. There are areas of a given dimension which are ashed and despite "caking" due to heavy water use by the fire department are a potential environmental and personal exposure risk due to wind and water erosion. Roofing materials will be handled separately. These may be sampled (if not already sampled) to ensure all layers are noted and any materials which contain asbestos such as felts or flashings will be disposed of as ACM containing materials.

The bricks and steel are in some areas, intermingled with the roofing materials and therefore contaminated with asbestos. Specific items of these building materials are most assuredly not contaminated while others are contaminated; it is merely an assumption and impossible to determine this without adequate testing.

C2. Hazardous Materials-Not Asbestos

Hazardous materials are present on the property as bulk quantities of either known or unknown chemicals. It is understood that these chemicals are present in 55 gallon drums either 17E or 17H steel drums and/or plastic containers. There are several smaller containers on site also, but these have not been investigated.

As these procedures are eventually initiated, it is the intent of the owner to ensure that these chemicals are accurately characterized in a timely manner. To characterize these chemicals, all available information will be collected and reviewed. Samples from allegedly same streams will be composited for the purpose of qualitative analysis. Otherwise, individual chemicals will be analytically qualified for the purpose of RCRA classification.

It is further understood that the federal Environmental Protection Agency representatives are seeking a timely response to handling these chemicals. It is the intent of the property owner to address this issue as quickly as feasible given the need to characterize these materials and the financial burden associated with properly handling these materials.

In accordance with the Resource Conservation and Recovery Act (RCRA), these materials will first be identified. The chemical analysis will allow classification of these chemicals into one of the RCRA categories, Ignitable, Corrosive, Reactive, or Toxic per 40 CFR 261.

Following that process, it will be determined whether these materials have any value as chemicals to avoid the wasteful, costly, and counter-productive action of disposing of materials that still have benefit.

This applies to those drums/containers of materials that which are known to the owner at this time or discovered during the process of evaluating the materials on-site.

D. Applicable Regulations

OSHA 29 CFR 1101 Asbestos in Construction

EPA 40 CFR 61 NESHAPS (National Emissions Standards for Hazardous Air Pollutants)

EPA 40 CFR 763

EPA 40 CFR 131

EPA 40 CFR 136

EPA 40 CFR 401

EPA 40 CFR 230.2b

EPA 40 CFR 401.10

EPA 40 CFR 261

OAC 3745-20

No wash water will be released to the drain, the ground, or to adjacent surface waters without first being tested for asbestos contamination.

E. Record keeping Records of all monitoring will be maintained as a sample log of the monitoring activities. These will include 1. Environmental air monitoring; 2. personal air monitoring; 3. Water monitoring; 4. Bulk sampling.

Records of any waste disposed of from the property will be manifested if hazardous and required or otherwise noted.

F. Procedures for Assessing and Clearing the Site at 154 Olive Street Elyria, OH

F1. Site Protection The site will be protected by a solid privacy fence attached to the existing metal chain link fence. This fence will provide a measure of dampening to the cross winds and will be the location of downwind perimeter air monitoring. The adjacent Aztec Steel property would need to be separated from the reclamation / assessment activities and to allow access to the site.

F2. Site Preparation There will be a primary means of entry/egress established on the East side of the property. All equipment will be brought in from this side of the project. (An alternate means of egress will be at the North West corner of the property at the junction of Olive Street with the railroad tracks)

The cleaned steel will be stored in a dumpster sited at the East side location.

The collected asbestos contaminated waste will be securely stored in a labeled covered dumpster sited at the East side location.

F3. Site Segregation The entire site that is open and not covered by the remaining buildings will be divided into discrete fields. These will be staked out in 50' by 50' areas. Each field will be assigned an identifying number for tracking purposes. Each field will be

evaluated for asbestos contamination both for the debris content and for the ground below this debris.

An appropriate barrier, if necessary, will be established to prevent contaminated water from leaving the site.

F4. Site Monitoring and Evaluation

Air Monitoring: Ambient air monitoring will be conducted at the perimeter during daily operations to verify the actual, expect negligible, release of airborne concentrations of asbestos fibers. This monitoring will be assessed by placing three high volume air monitoring pumps downwind of any site activity. Pumps will be placed at the property line (protective fence line) spaced approximately 100 feet apart downwind of any activities. These pumps will be calibrated for accuracy and run for the entire period of each day's activity collecting samples representative of asbestos fibers released.

Water Monitoring: When washing is completed, the continuously filtered water, will be tested for contamination with asbestos fibers.

Ground Contamination Monitoring: Once the debris has been cleared from a given field, samples of the dirt in that field will be collected and analyzed for asbestos contamination. For each sector, five samples will be collected and composited for analysis. Each of the five samples will be to a depth of 5 inches. Samples indicating results below environmental regulatory limits will suffice to deem the field clear of asbestos contamination.

F5. Personnel Monitoring At least 25% of the workers will be monitored for asbestos exposure per OSHA regulations (29CFR 1926.1101).

F6. Personnel Protection Workers moving building materials only will have category B personal protection including respirator half face model and a protective suit or clothing.

Abatement workers will have the protective equipment appropriate for the level of activity they will be carrying out as required.

F7. Personal Training The workers who are moving bricks or steel will receive the two hours awareness training. This training is sufficient by OSHA to alert workers to the existence of asbestos and precautions to exercise to avoid creating an exposure condition. This activity is considered a Class IV activity according to OSHA.

Abatement workers will be licensed according the the Ohio Department of Health to handle abatement work as required.

F8. Mobilization Equipment will be staged on the East end of the property. Working lanes will be developed along the North property line. This allows for reasonable access to the north side of the building as needed, and to access the chemicals along the

back of the building.

Staging will be implemented so as to minimize disturbance of the property and its contents while maximizing the efficiency of the process.

A dumpster will be placed at this location for placement of washed scrap steel for reclamation.

A dumpster will be placed at this location for placement of asbestos contaminated waste.

F9. Processing Brick Any given field may or may not be contaminated with asbestos. As with all asbestos evaluations, the visual inspection is the important first step in assessing the contamination level. Each field will be visually inspected for evidence of friable asbestos contamination. When evidence of gross contamination is noted, this will be collected first. The suspect asbestos contamination will be properly contained as asbestos waste, labeled and secured.

Some bricks may not be salvaged, being too contaminated. These will be disposed of as asbestos contaminated waste.

Bricks with no visible contamination will be processed by washing. Bricks will be collected from a given field, transported into the wash station, manually placed onto the conveyor and sent through the washing process. Bricks will be considered clean and asbestos free following the washing process. The process will be effective due to the use of pressurized water used to clean the materials. This process will be enclosed in order to prevent unnecessary contamination of the surrounding area. Whole washed bricks will then be placed on a pallet to be removed for sale. Partial bricks will be set aside for crushing. Crushing of the washed brick will be carried out in an adjacent area.

The water used to wash the bricks will be collected, filtered using a 5 micron filter, and reused for washing additional bricks. When washing has been completed, the water will be filtered, tested to verify that all the asbestos contamination has been removed, then released to the storm drain.

Following the final phase of washing the bricks, the container used to recycle the wash water will be rinsed three times, the water will be filtered, tested to verify all asbestos contamination has been removed, then released to the storm drain.

F10. Processing Steel Any given field may or may not be contaminated with asbestos. As with all asbestos evaluations, the visual inspection is the important first step in assessing the contamination level. Each field will be visually inspected for evidence of friable asbestos contamination. When evidence of gross contamination is noted, this will be collected first. The suspect asbestos contamination will be properly contained as asbestos waste, labeled and secured.

Steel will be processed by rinsing to clear any asbestos. The steel will be moved from each sector to the wash tank, manually washed-catching the rinse water in a large tank. This water will be collected inside the tank. The water will be filtered using a 5 micron filter and reused for washing additional suspect asbestos contaminated steel. When washing has been completed, the water will be filtered, tested to verify that all the asbestos contamination has been removed, then released to the storm drain. The tank used for steel will be the larger ground based tank at the Southeast section of the property.

Following the final phase of washing of the steel, the container used to recycle the wash water will be rinsed, the water filtered, tested to verify all asbestos contamination has been removed, then released to the storm drain.

G. Terminology

Asbestos The six commonly defined species of asbestos known as chrysotile, amosite, crocidolite, tremolite, anthophyllite and actinolite.

"High volume" used for air pumps capable of collecting in excess of 10 liters per minute of air.

"Low volume" used for air pumps capable of collecting between 0.5 and 5.0 liters per minute of air.

Reclamation includes the sale or reuse of any building materials or equipment on-site and potentially contaminated with asbestos.